

# Exhibit A

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA  
SOUTHERN DIVISION

- - -

THE HONORABLE JAMES V. SELNA, JUDGE PRESIDING

UNITED STATES OF AMERICA,	)	CERTIFIED TRANSCRIPT
Plaintiff,	)	
vs.	)	
	)	SACR-19-00061-JVS
MICHAEL JOHN AVENATTI,	)	
Defendant.	)	TRIAL DAY 8, Vol. 1
-----	)	

REPORTER'S TRANSCRIPT OF PROCEEDINGS

Santa Ana, California

July 23, 2021

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United States Courthouse  
411 West 4th Street, Suite 1-1053  
Santa Ana, CA 92701  
(714) 543-0870

SHARON A. SEFFENS, U.S. DISTRICT COURT REPORTER

09:35 1 created or edited any document, correct?

09:35 2 A Correct. I don't know whether you specifically were at  
09:35 3 the computer at the time.

09:35 4 Q Sir, thank you for your candor.

09:35 5 THE COURT: Redirect.

09:35 6 MR. WYMAN: No, Your Honor. Thank you.

09:35 7 THE COURT: May the witness be excused?

09:35 8 MR. AVENATTI: We would like to reserve the  
09:35 9 opportunity to potentially recall him, Your Honor.

09:36 10 THE COURT: Sir, you are excused for now but  
09:36 11 you're on recall. Thank you.

09:36 12 Would the government call its next witness,  
09:36 13 please.

09:36 14 MR. WYMAN: Thank you, Your Honor.

09:36 15 The United States calls Carlos Colorado.

09:36 16 CARLOS COLORADO, GOVERNMENT'S WITNESS, SWORN

09:36 17 THE CLERK: If you will pull the microphone  
09:36 18 towards you and state and spell your first and last name.

09:37 19 THE WITNESS: Carlos Colorado, C-a-r-l-o-s,  
09:37 20 C-o-l-o-r-a-d-o.

09:37 21 THE COURT: Mr. Wyman.

09:37 22 MR. WYMAN: Thank you, Your Honor.

09:37 23 DIRECT EXAMINATION

09:37 24 BY MR. WYMAN:

09:37 25 Q Good morning, Mr. Colorado.

09:37 1 A Good morning.

09:37 2 Q What do you do for a living?

09:37 3 A I'm an attorney.

09:37 4 Q What law firm do you currently work for?

09:37 5 A I work for a law firm called the X-Law Group.

09:37 6 Q Between 2012 and March 2019, where did you work?

09:37 7 A At that time I worked at Eagan Avenatti, LLP.

09:37 8 Q What kind of cases does Eagan Avenatti handle or did

09:37 9 Eagan Avenatti handle at that time?

09:37 10 A Usually represented plaintiffs in complex litigation.

09:37 11 Q Prior to joining Eagan Avenatti, did you interview with

09:37 12 any attorneys at the firm?

09:37 13 A Yes, I did.

09:37 14 Q Was the defendant Michael Avenatti one of those

09:37 15 attorneys you interviewed with?

09:38 16 A He was.

09:38 17 Q When you joined the firm, what was your title?

09:38 18 A I was an associate.

09:38 19 Q Generally speaking, what were your responsibilities as

09:38 20 an associate at Eagan Avenatti?

09:38 21 A As an associate I was responsible for the day-to-day

09:38 22 handling of the cases that I was assigned to.

09:38 23 Q So did you work on cases with other more senior

09:38 24 attorneys at the time?

09:38 25 A Yes, I did.

09:38 1 Q Did you work on cases with the defendant?

09:38 2 A I did.

09:38 3 Q During your time at the firm, how would you describe  
09:38 4 the defendant's role at Eagan Avenatti?

09:38 5 A During the time that I was there, Mr. Avenatti was the  
09:38 6 head of the office, the head of the firm, and he was  
09:38 7 responsible as far as I could tell for you all the business  
09:39 8 decisions and the final word on the legal aspects of the  
09:39 9 cases we were handling.

09:39 10 Q When you worked with the defendant on his cases, how  
09:39 11 closely involved was he on the day-to-day operations of the  
09:39 12 business?

09:39 13 MR. AVENATTI: Objection, Your Honor. Lacks  
09:39 14 foundation.

09:39 15 THE COURT: Overruled.

09:39 16 THE WITNESS: Generally he would give us --  
09:39 17 delegate the day-to-day handling of the sort of routine  
09:39 18 aspects of litigation, but he was involved in -- he was  
09:39 19 knowledgeable of the details. We would debrief him on a  
09:39 20 daily basis on what was happening.

09:39 21 BY MR. WYMAN:

09:39 22 Q When you say we, are you referring to yourself and  
09:40 23 other attorneys?

09:40 24 A Correct.

09:40 25 Q Would the defendant's level of involvement in a case

1 change as the case neared a resolution?

2 MR. AVENATTI: Objection, Your Honor. Foundation.

3 THE COURT: Overruled.

4 THE WITNESS: Yes. Typically his involvement  
5 would increase as cases neared resolution.

6 BY MR. WYMAN:

7 Q And when I am saying resolution, what do you understand  
8 that to mean?

9 A When a case is resolved, generally that involves either  
10 going to court and getting a verdict or reaching some kind  
11 of settlement between the parties that ends the case.

12 Q As the defendant became more involved as the cases  
13 neared settlement or some resolution, would your role in  
14 those cases change at all?

15 A Sure. As he became more involved, my role diminished.

16 Q I want to turn now to a particular case handled by  
17 Eagan Avenatti. At some point during your time at that  
18 firm, were you assigned to work on a case for a client named  
19 Geoffrey Johnson?

20 A Yes, I was.

21 Q Did that case involve civil rights allegations against  
22 the County of Los Angeles?

23 A It did.

24 Q And was this one of the defendant's cases that you  
25 worked on?

09:41 1 A Correct.

09:41 2 Q Generally speaking, what was your role on that case?

09:41 3 A As in other cases that I worked on but especially that  
09:41 4 case because it was the first case that I was assigned when  
09:41 5 I arrived at Eagan Avenatti, I was in charge of the  
09:41 6 day-to-day handling of the case, meaning I drafted the  
09:41 7 complaint; I drafted discovery that was served on the County  
09:42 8 and the defendants and responded to discovery, engaged in  
09:42 9 communications with opposing counsel about those day-to-day  
09:42 10 aspects.

09:42 11 Q Did you also communicate with the client, Geoffrey  
09:42 12 Johnson?

09:42 13 A At some point I did communicate with Mr. Johnson.

09:42 14 Q Did you meet with him in person?

09:42 15 A Not typically, but once or twice I did.

09:42 16 Q Let me show you what is already in evidence as  
09:42 17 Exhibit 1. It will be on the screen. And also if you would  
09:42 18 like to review the entire document, it's in Volume 1 of the  
09:42 19 binders behind you.

09:42 20 A Okay. Is the screen going to come up? Thank you.

09:42 21 Q Do you recognize this?

09:42 22 A Yes.

09:43 23 Q What is it?

09:43 24 A It's what we call a retainer agreement, the contract  
09:43 25 with the client and an attorney.

09:43 1 Q And who is this retainer agreement with?

09:43 2 A This is the retainer agreement between Eagan Avenatti  
09:43 3 and Mr. Johnson.

09:43 4 MR. WYMAN: If you could please pull up paragraph  
09:43 5 four on page 1.

09:43 6 BY MR. WYMAN:

09:43 7 Q What amount of attorney fees does this agreement call  
09:43 8 for?

09:43 9 MR. AVENATTI: Objection, Your Honor. The  
09:43 10 document speaks for itself. Best evidence.

09:43 11 THE COURT: Overruled.

09:43 12 THE WITNESS: It states that the attorney will  
09:43 13 receive a contingent fee of 40 percent.

09:43 14 BY MR. WYMAN:

09:43 15 Q To your knowledge was there any other agreement between  
09:43 16 Eagan Avenatti and Geoffrey Johnson regarding attorney's  
09:43 17 fees?

09:43 18 A Not to my knowledge.

09:43 19 Q If you could please look in the binder behind you,  
09:44 20 Volume 1, at what has been marked government's Exhibit 7.

09:44 21 A (Witness complies.) Yes.

09:44 22 Q Do you recognize this document?

09:44 23 A Yes, I do.

09:44 24 Q Is this a fair and accurate copy of an e-mail exchange  
09:44 25 that you were on with the defendant?



10:00 1 of that exhibit where the signatures are, do you see on the  
10:00 2 signature block that your name is listed as an attorney for  
10:00 3 plaintiff?

10:00 4 A Yes.

10:00 5 Q Is that your signature?

10:00 6 A No.

10:00 7 Q Do you know whose signature that is?

10:00 8 A I'm not certain, but it looks like Mr. Avenatti's  
10:00 9 signature.

10:00 10 MR. WYMAN: Thank you. No further questions.

10:00 11 THE COURT: Mr. Avenatti.

10:00 12 MR. AVENATTI: Thank you, Your Honor.

10:00 13 CROSS-EXAMINATION

10:01 14 BY MR. AVENATTI:

10:01 15 Q Mr. Colorado, good morning.

10:01 16 A Good morning.

10:01 17 Q You and I worked together for a number of years; did we  
10:01 18 not?

10:01 19 A We did.

10:01 20 Q And I was the one who made the decision to hire you at  
10:02 21 my law firm, right?

10:02 22 A Yes.

10:02 23 Q And you and I enjoyed a good working relationship  
10:02 24 during those years; did we not?

10:02 25 A We did.

10:03 1 Q Nothing usual about that, right?

10:04 2 A Correct.

10:04 3 Q Now, you are not suggesting to this jury that I wasn't

10:04 4 involved in my cases; are you?

10:04 5 A Not at all.

10:04 6 Q Why are you not suggesting to the jury that I was not

10:04 7 involved in my cases?

10:04 8 A Well, I have testified that you were involved in the

10:04 9 cases.

10:04 10 Q For the most part I was very involved in my cases;

10:04 11 wasn't I?

10:04 12 A I think so.

10:04 13 Q Sir, in your experience isn't it true that almost every

10:04 14 pleading of any significance in any case would be reviewed

10:05 15 by me before it was filed?

10:05 16 A Yes. That's true.

10:05 17 Q No matter where I was in the country, right?

10:05 18 A Generally true.

10:05 19 Q No matter where I was in the world?

10:05 20 A Correct.

10:05 21 Q At all hours of the day. You experienced that; did you

10:05 22 not?

10:05 23 A For the most part, yes.

10:05 24 Q You would receive e-mails from me sometimes in the

10:05 25 middle of the night and sometimes very early in the morning

10:05 1 relating to my input on matters at the firm that you were  
10:05 2 working with me on; isn't that true?

10:05 3 A That is true.

10:05 4 Q When it came to the legal filings in our cases, I was  
10:06 5 incredibly hands-on; is that fair?

10:06 6 A That's fair.

10:06 7 Q Did I appear to you to be devoted to the cases?

10:06 8 A Also fair.

10:06 9 Q And it's also fair that I needed help working up the  
10:06 10 cases because I wasn't able to do everything on every case  
10:06 11 that we had, right?

10:06 12 A Right.

10:06 13 Q Because at various points in time we would represent  
10:06 14 hundreds if not thousands of plaintiffs, right?

10:06 15 A Hundreds.

10:06 16 Q Well, some of our cases had thousands of plaintiffs?

10:06 17 A Correct.

10:07 18 Q Okay. So at any given time we would represent hundreds  
10:07 19 and thousands of individuals in cases, right?

10:07 20 A I think that's fair.

10:07 21 Q Okay. And those cases weren't just confined to  
10:07 22 California. Those cases were brought all around the  
10:07 23 country, right?

10:07 24 A Yes.

10:07 25 Q You worked on cases in California. You worked on cases

10:07 1 in Texas. You worked on cases in other states, right?

10:07 2 A Correct.

10:07 3 Q And when it came time to travel in connection with  
10:07 4 those cases to make court appearances or take depositions  
10:07 5 where people give testimony, was that generally -- was that  
10:07 6 what you did?

10:07 7 A Sometimes.

10:07 8 Q But not most of the time?

10:08 9 A I honestly am not sure about that.

10:08 10 Q Okay. Who would travel more in connection with those  
10:08 11 cases, me or you?

10:08 12 MR. WYMAN: Calls for speculation.

10:08 13 THE COURT: Overruled.

10:08 14 THE WITNESS: I honestly don't know.

10:08 15 BY MR. AVENATTI:

10:08 16 Q Well, Mr. Colorado, you would be in contact with me  
10:08 17 when I would be in other locations making court appearances.  
10:08 18 You recall that, right?

10:08 19 A Sure.

10:08 20 Q Okay. And as cases got closer to trial, there would be  
10:08 21 a ramp-up of activity in connection with a case, right?

10:08 22 A Yes.

10:08 23 Q And was that necessary?

10:08 24 A Absolutely.

10:08 25 Q Explain to the jury why that would be necessary.

10:09 1 A As cases escalated and they become more advanced in  
10:09 2 litigation, there is usually more need to make appearances  
10:09 3 in court and to make filings in court, and all of those  
10:09 4 things require a lot of preparation, research, and the  
10:09 5 involvement of more experienced and senior lawyers.

10:09 6 Q And while you were at the firm, there were cases that  
10:09 7 went to trial; am I right?

10:09 8 A Yes.

10:09 9 Q Big cases?

10:09 10 A Yes.

10:09 11 Q Complicated cases?

10:09 12 MR. WYMAN: Objection. Relevance.

10:09 13 THE COURT: Overruled.

10:09 14 THE WITNESS: Correct.

10:09 15 BY MR. AVENATTI:

10:09 16 Q Cases involving in some instances millions of pages of  
10:09 17 documents, right?

10:09 18 A Right.

10:09 19 Q And the primary person who was responsible for  
10:09 20 representing those clients at trial was me, right?

10:10 21 A Yes.

10:10 22 Q And you observed, did you not, weeks where I would  
10:10 23 spend well over a hundred hours a week working on a case in  
10:10 24 the middle of trial?

10:10 25 A Yes.

10:53 1 A Yes.

10:53 2 Q He's the gentleman seated right to my left; is that

10:53 3 right?

10:53 4 A I believe so.

10:53 5 Q Okay. And Mr. Ryan Roberson; is that right?

10:54 6 A I don't recall if he was at that meeting. I do not

10:54 7 dispute it.

10:54 8 Q Okay. And you recognize him in the courtroom, right?

10:54 9 He's seated to our left of Mr. Kim?

10:54 10 A I recognize him.

10:54 11 Q And then you also met with Julian Andre that day,

10:54 12 Mr. Sagel's colleague at the U.S. Attorney's Office,

10:54 13 correct, that first meeting September 2019?

10:54 14 A I don't recall.

10:54 15 Q But you don't dispute it?

10:54 16 A That is correct.

10:54 17 Q And that meeting lasted from approximately 10:33 a.m.

10:54 18 to 1:44 p.m. Am I right about that?

10:54 19 A I don't recall the duration, but I don't dispute it.

10:54 20 Q Okay. So a little over three hours, fair?

10:54 21 A Possible.

10:55 22 Q I'm sorry?

10:55 23 A Possible.

10:55 24 Q And during that meeting about a year and a half or more

10:55 25 ago, you told the government that you never saw any

10:55 1 suspicious funds or red flags while working at my law firm;  
10:55 2 didn't you?

10:55 3 A Sounds consistent with what I generally said. I don't  
10:55 4 recall specifically those words, but I'm sure I said  
10:55 5 something to that effect.

10:55 6 Q Would you like to refresh your recollection?

10:55 7 A Sure.

10:55 8 MR. AVENATTI: Your Honor, may I approach?

10:55 9 THE COURT: You may.

10:55 10 BY MR. AVENATTI:

10:56 11 Q Sir, I would like to direct your attention to paragraph  
10:56 12 five of that document.

10:56 13 A (Witness reviewing document) Okay.

10:56 14 Q I think you testified on direct examination that you  
10:56 15 worked at my law firm and with me from 2012 until early  
10:56 16 2019; is that right?

10:57 17 A That's right.

10:57 18 Q We worked closely together, did we not, on a lot of  
10:57 19 different cases?

10:57 20 A Yes.

10:57 21 Q Isn't it true that you told the government in  
10:57 22 September of 2019 that you never saw any suspicious funds or  
10:57 23 red flags while working at my law firm?

10:57 24 A Again I don't specifically recall saying that, but I  
10:57 25 don't dispute that that's consistent with what I generally

10:57 1 said.

10:57 2 Q Well, looking at the document, does that refresh your  
10:57 3 recollection?

10:57 4 MR. WYMAN: Asked and answered.

10:57 5 THE COURT: Overruled.

10:57 6 THE WITNESS: It doesn't particularly refresh my  
10:57 7 recollection.

10:57 8 BY MR. AVENATTI:

10:57 9 Q But you don't dispute it?

10:57 10 A I do not.

10:57 11 Q When you met with the government in September of 2019,  
10:57 12 multiple agents and the Assistant U.S. Attorney, isn't it  
10:57 13 true that you told the government that you are not aware of  
10:57 14 me ever forging any signature?

10:58 15 A I don't recall saying that, but that statement is true.  
10:58 16 I have no knowledge of that.

10:58 17 Q Okay. Well, let me direct your attention to paragraph  
10:58 18 64. My focus is on what you told the government a year and  
10:58 19 a half ago.

10:58 20 MR. WYMAN: Your Honor, this calls for hearsay.  
10:58 21 It's also not impeachment on an issue that was presented on  
10:58 22 direct.

10:59 23 THE COURT: Overruled.

10:59 24 BY MR. AVENATTI:

10:59 25 Q Mr. Colorado, looking at paragraph 64, does that



10:59 1 refresh your recollection that you informed the government  
10:59 2 over 18 months ago that you were not aware of me ever  
10:59 3 forging any signatures?

10:59 4 A It does not refresh my recollection in the sense that I  
10:59 5 did remember something and now I remember from seeing this.  
10:59 6 But as I said, I don't deny that I said it. I very well  
10:59 7 probably said it because I believe that to still be true.

10:59 8 Q Isn't it true that when you met with the government  
10:59 9 over 18 months ago, you also told them that you weren't  
10:59 10 aware of me ever impersonating anyone else?

10:59 11 A I don't recall that at all.

10:59 12 Q But do you dispute it?

10:59 13 A No.

10:59 14 Q Isn't it true that you also told the government over 18  
10:59 15 months ago that you were not aware of me falsifying or  
11:00 16 destroying any documents during the entire time period that  
11:00 17 you were working with me at my firm?

11:00 18 A I don't recall saying it, but I don't recall knowing  
11:00 19 that you destroyed documents.

11:00 20 Q Or falsifying any documents?

11:00 21 A Or falsifying any documents.

11:00 22 Q Do you have a recollection of telling the government in  
11:00 23 September of 2019 that you were not aware of me ever  
11:00 24 engaging in any suspicious conduct during the entire time  
11:00 25 period that you worked with me closely at Eagan Avenatti?

11:00 1 A I do remember saying that.

11:00 2 Q Do you stand behind it?

11:00 3 A That I do not recall seeing you engage in any  
11:00 4 suspicious conduct?

11:00 5 Q Yes.

11:01 6 A Yes.

11:01 7 Q Mr. Colorado, thank you for your candor.

11:01 8 MR. AVENATTI: Nothing further, Your Honor.

11:01 9 THE COURT: Redirect.

11:01 10 MR. WYMAN: Briefly, Your Honor. Thank you.

11:01 11 REDIRECT EXAMINATION

11:01 12 BY MR. WYMAN:

11:01 13 Q Good morning again, Mr. Colorado.

11:01 14 A Good morning.

11:01 15 MR. WYMAN: Could you please pull up Exhibit 21,  
11:01 16 and if you could blow up the e-mail at the bottom there.

11:01 17 BY MR. WYMAN:

11:01 18 Q It's on the screen in front of you, if that's easier.

11:01 19 Do you recall the defendant asking you about this e-mail?

11:02 20 A Yes.

11:02 21 Q And I believe you discussed how it was on the eve of  
11:02 22 trial as well as approaching settlement?

11:02 23 A Right.

11:02 24 Q Do you see in his e-mail there how he mentioned the  
11:02 25 mediation, settlement, et cetera, and telling you not to

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA  
SOUTHERN DIVISION

- - -

THE HONORABLE JAMES V. SELNA, JUDGE PRESIDING

UNITED STATES OF AMERICA, ) CERTIFIED TRANSCRIPT  
Plaintiff, )  
vs. )  
MICHAEL JOHN AVENATTI, ) SACR-19-00061-JVS  
Defendant. ) TRIAL DAY 21, VOL. 1  
-----)

REPORTER'S TRANSCRIPT OF PROCEEDINGS

Santa Ana, California

August 17, 2021

SHARON A. SEFFENS, RPR  
United States Courthouse  
411 West 4th Street, Suite 1-1053  
Santa Ana, CA 92701  
(714) 543-0870

10:56 1 MR. AVENATTI: Thank you, sir.

10:56 2 BY MR. AVENATTI:

10:56 3 Q Mr. Colorado, the document that I placed in front of  
10:56 4 you, now that it has refreshed your recollection, do you  
10:56 5 recall other matters that you worked on at the firm while  
10:56 6 you were there?

10:56 7 A Yes. I recall most of these matters that are on the  
10:56 8 document you handed me.

10:56 9 Q Most of these matters are different than the matters  
10:57 10 you testified about earlier, is that right, or at least half  
10:57 11 of them?

10:57 12 A That's correct.

10:57 13 Q While you were at the firm, did you report to attorneys  
10:57 14 that were senior to you other than me from time to time?

10:57 15 A Yes.

10:57 16 Q And did you communicate with clients and opposing  
10:57 17 parties at their request?

10:57 18 MR. WYMAN: 401, 403.

10:57 19 THE COURT: Overruled.

10:57 20 THE WITNESS: Yes.

10:57 21 BY MR. AVENATTI:

10:57 22 Q Sir, while you were at the firm, in connection with  
10:57 23 some matters would you keep track of your time?

10:58 24 A Yes.

10:58 25 Q Explain to the jury how you would do that.

10:58 1 A For some of the -- actually for all of the matters, I  
10:58 2 tried to keep an Excel spreadsheet that I would log my hours  
10:58 3 on for personal reference. There was no need for billing  
10:58 4 purposes on most of the matters to do time entry both in  
10:58 5 order to track what I was working on and efficiency and so  
10:58 6 forth, I track using those Excel spreadsheets.

10:58 7 Q For some matters you did track your time for billing  
10:58 8 purposes; isn't that true?

10:58 9 A Correct.

10:58 10 Q And for the matters that you tracked your time for  
10:58 11 billing purposes, how would that work?

10:58 12 MR. WYMAN: Objection. Relevance.

10:58 13 THE COURT: Mr. Avenatti.

10:58 14 MR. AVENATTI: Your Honor, it goes hand in hand  
10:58 15 with Tabs and it goes hand in hand with some of the matters  
10:58 16 that were handled that were that were non-contingency, Your  
10:59 17 Honor.

10:59 18 THE COURT: Sustained.

10:59 19 BY MR. AVENATTI:

10:59 20 Q Mr. Colorado, were you aware of a program called Tabs  
10:59 21 while you were at the firm?

10:59 22 A I was not.

10:59 23 Q Would you give your time when it was being tracked to  
10:59 24 an administrative assistant to be input into a computer  
10:59 25 program?

10:59 1 MR. WYMAN: Relevance, 403.

10:59 2 THE COURT: Overruled.

10:59 3 THE WITNESS: Yes.

10:59 4 BY MR. AVENATTI:

10:59 5 Q So you would keep track of your time and then you would  
10:59 6 give it to another individual at the firm who would input it  
10:59 7 into a computer program, right?

10:59 8 MR. WYMAN: Asked and answered.

10:59 9 THE COURT: Sustained.

10:59 10 BY MR. AVENATTI:

10:59 11 Q Who did you give your time to in order to be input into  
10:59 12 this computer program?

10:59 13 A I gave my Excel spreadsheets that I used to our  
10:59 14 receptionist.

10:59 15 Q And who was that at the time?

10:59 16 A It was a woman by the name of Hillary.

10:59 17 Q Hillary Wolett?

10:59 18 A Correct.

10:59 19 Q And you understood that Ms. Wolett would be inputting  
11:00 20 that into a computer program, but you did not know the name  
11:00 21 of the program; is that right?

11:00 22 A Correct.

11:00 23 Q And did you have the understanding that after the time  
11:00 24 would be inputted into the computer program, that a bill  
11:00 25 would be generated from time to time with a client that

11:00 1 would reflect your time?

11:00 2 MR. WYMAN: Leading, foundation, and 403.

11:00 3 THE COURT: Leading, sustained.

11:00 4 BY MR. AVENATTI:

11:00 5 Q Mr. Colorado, did you understand that your time that  
11:00 6 you were tracking that was put into the computer program,  
11:00 7 that that time would be used for some purpose ultimately?

11:00 8 A Yes.

11:00 9 Q And what purpose did you understand that that time  
11:00 10 would be used for?

11:00 11 A My understanding was that the calculation from the  
11:00 12 time, the time that was tracked, would be used at the time  
11:01 13 that there was any award or verdict in order to justify the  
11:01 14 firm's fees in that case.

11:01 15 Q Did you also have -- well, strike that. While you were  
11:01 16 at the firm, did you understand that the firm also did  
11:01 17 hourly work for clients, meaning billed by the hour?

11:01 18 A For some of the clients like AT&T, yes.

11:01 19 Q And did you have the understanding that one of the  
11:01 20 purposes for which this time tracking, did you have the  
11:01 21 understanding that one of the purposes was so that the hours  
11:01 22 could then be billed to the client at an hourly rate?

11:01 23 A Yes.

11:01 24 Q Did you have occasion to review draft bills before they  
11:01 25 were sent to clients?